



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MAY 1 - 2000

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Leon Moss
First National Bank and Trust Company
PO Box 948
McAlester, Oklahoma 74502-0948


RE: MUR 4818/4933

Dear Mr. Moss:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended ("Act"). The Commission has issued the attached Subpoena which requires the production of certain information in connection with an investigation it is conducting. The Commission does not consider the First National Bank and Trust Company a respondent in this matter, but rather a witness only. The response to the enclosed Subpoena must be submitted to the General Counsel's Office within 30 days of your receipt of this letter.

If you have any questions or would like to discuss this matter, please contact me or Margaret Toalson, the other attorney assigned to this matter, at (800) 424-9530 or (202) 694-1650.

Sincerely,


Xavier K. McDonnell
Attorney

Enclosure:
Subpoena

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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MUR 4818

SUBPOENA TO PRODUCE DOCUMENTS

To: First National Bank and Trust Company
PO Box 948
McAlester, Oklahoma 74502-0948

Attn: Leon Moss

Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby subpoenas you to produce all bank records for Walt Roberts for Congress (Acct. #) and Walt Roberts for Congress General Election Account (Acct:) from December 1, 1997 through December 31, 1998. Legible copies which, where applicable, show both sides of the documents may be substituted for originals.

The documents must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, within 30 days of receipt.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his
hand in Washington, D.C. on this 28th day of April, 2000

For the Commission,

Darryl R. Wold
Darryl R. Wold
Chairman

ATTEST:

Darlene Harris
for Mary W. Dove
Secretary to the Commission

Attachments
Instructions and Definitions

INSTRUCTIONS

In answering this Subpoena to Produce Documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories or requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

The document request is continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" or "your" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers; employees, whether paid or unpaid; supervisors; volunteers; agents or persons otherwise working on behalf of or at the request of the named respondent; co-workers; subordinates; staff or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers, records and magnetic or electronic media of every type in your possession, custody, or control, or known by you to exist. The term document includes but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, check registers, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained. If a document request calls for a document that is maintained on or in a magnetic, optical or electronic medium (for example, but not limited to computer tape, diskette, or CD-ROM), provide both "hard" (i.e., paper) and "soft" (i.e., in the magnetic or electronic medium) copies, including drafts, and identify the name (e.g., WordPerfect, Microsoft Word for Windows, Pro Write, etc.) and version numbers by which the document(s) will be most easily retrieved.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document, the author of the document, and all recipients of the document (including all persons, other than the primary recipient(s) of the document, who received copies, such as "cc" and "bcc" recipients).

"And" as well as "or" shall be construed distinctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and may otherwise be construed to be out of their scope

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